

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF VERMONT**

---

In re:

Roman Catholic Diocese of Burlington,  
Vermont,<sup>1</sup>

Case No.: 24-10205-HZC  
Chapter 11 Case

Debtor.

---

**FREDRIKSON & BYRON, P.A.'S MONTHLY FEE STATEMENT  
FOR MARCH 2025**

---

Pursuant to the Court's Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees (ECF No. 180, the "Compensation Order"), Fredrikson & Byron, P.A. ("Fredrikson"), as Chapter 11 counsel for the Roman Catholic Diocese of Burlington, Vermont (the "Diocese"), files this monthly fee statement seeking compensation for reasonable and necessary services to the Diocese from March 1, 2025 to March 31, 2025 (the "Compensation Period")<sup>2</sup> in the amount of \$26,333.20 (80% of \$32,916.50) and reimbursement of actual and necessary expenses incurred during the Compensation Period in the amount of \$210.00.

Fredrikson's invoices for the Compensation Period, attached hereto as Exhibit A,<sup>3</sup> show the individuals who provided services during the Compensation Period (James L. Baillie

---

<sup>1</sup> In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Diocese's address is 55 Joy Drive, South Burlington, Vermont 05403, and its Employer Identification Number (EIN) is 03-0180730.

<sup>2</sup> Due to a delay in system processing, some February 2025 time entries appear on Matter No. 5013.

<sup>3</sup> Each of the invoices include a cover page including a calculation of the 80% amount owed. For the avoidance of doubt, the invoices include 100% of the time entries and expenses for the Compensation Period.

(shareholder); Steven R. Kinsella (shareholder); Samuel M. Andre (shareholder); Katherine A. Nixon (associate); and Shataia Stallings (paralegal)); their respective billing rates; the aggregate hours spent by each individual; a reasonably detailed breakdown of the expenses incurred; and contemporaneously maintained time entries for each individual in increments of tenths (1/10) of an hour.

Any party in interest has until **4:00 p.m. (prevailing Eastern time) on April 25, 2025** to object to the requested fees and expenses in accordance with the procedures in the Compensation Order. If no objection is filed, Fredrikson will file a certificate of no objection with the Court and the Diocese will be authorized to pay Fredrikson the amounts described herein.

Dated: April 11, 2025

/s/ Steven R. Kinsella

Raymond J. Obuchowski  
**OBUCHOWSKI LAW OFFICE**  
1542 Route 107, PO Box 60  
Bethel, VT 05032  
(802) 234-6244  
ray@oeblaw.com

James L. Baillie (*pro hac vice*)  
Steven R. Kinsella (*pro hac vice*)  
Samuel M. Andre (*pro hac vice*)  
Katherine A. Nixon (*pro hac vice*)  
**FREDRIKSON & BYRON, P.A.**  
60 South Sixth Street, Suite 1500  
Minneapolis, MN 55402-4400  
(612) 492-7000  
jbaillie@fredlaw.com  
skinsella@fredlaw.com  
sandre@fredlaw.com  
knixon@fredlaw.com

**ATTORNEYS FOR THE ROMAN CATHOLIC  
DIOCESE OF BURLINGTON, VERMONT**

**EXHIBIT A**

Invoice: 1921192  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5000

**Fredrikson**

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

For Previously Unbilled Professional Services Rendered Through March 31, 2025

**Regarding: Case Administration**

Total for Current Legal Fees:	\$ 0.00
Total For Current Costs and Other Charges:	\$ 210.00
<b>Total For Current Invoice:</b>	<b>\$ 210.00</b>
<b>Your 80% Due:</b>	<b>\$ 168.00</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

*Payment is due within 30 days from receipt of invoice*

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888523	43,312.28		43,312.28
12/05/24	1895348	12,147.17		12,147.17
01/06/25	1901844	8,114.32		8,114.32
03/10/25	1914882	5,342.47		5,342.47
<b>Total Prior Balance:</b>				<b>\$ 68,916.24</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 4, 2025. If payment has been sent close to this date, please verify payment status.



Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

**Costs and Other Charges**

Litigation Support Services	210.00
-----------------------------	--------

<b>Current Costs and Other Charges:</b>	<b>\$ 210.00</b>
---	------------------

**Invoice Totals**

Total for Current Legal Fees:	\$ 0.00
-------------------------------	---------

Total For Current Costs and Other Charges:	\$ 210.00
--	-----------

<b>Total For Current Invoice:</b>	<b>\$ 210.00</b>
-----------------------------------	------------------

<b>Your 80% Due:</b>	<b>\$ 168.00</b>
----------------------	------------------

Invoice: 1921193  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5002



Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

For Previously Unbilled Professional Services Rendered Through March 31, 2025

**Regarding: Asset Disposition**

Total for Current Legal Fees:	\$ 254.00
<b>Total For Current Invoice:</b>	<b>\$ 254.00</b>
<b>Your 80% Due:</b>	<b>\$ 203.20</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888525	862.50		862.50
<b>Total Prior Balance:</b>				<b>\$ 862.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 4, 2025. If payment has been sent close to this date, please verify payment status.



Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/24/25	S. Kinsella	Communications with client regarding potential real estate sale.	0.40	254.00
		<b>Current Legal Fees:</b>	<b>0.40</b>	<b>\$ 254.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.32	203.20
<b>Total</b>		<b>0.32</b>	<b>\$ 203.20</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 254.00
<b>Total For Current Invoice:</b>	<b>\$ 254.00</b>
<b>Your 80% Due:</b>	<b>\$ 203.20</b>



Invoice: 1921194  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5006

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

For Previously Unbilled Professional Services Rendered Through March 31, 2025

**Regarding: Business Operations**

Total for Current Legal Fees:	\$ 3,514.50
<b>Total For Current Invoice:</b>	<b>\$ 3,514.50</b>
<b>Your 80% Due:</b>	<b>\$ 2,811.60</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888530	22,607.50		22,607.50
12/05/24	1895350	1,427.50		1,427.50
01/06/25	1901846	8,377.00		8,377.00
03/10/25	1914880	4,970.00		4,970.00
<b>Total Prior Balance:</b>				<b>\$ 37,382.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 4, 2025. If payment has been sent close to this date, please verify payment status.



Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	S. Kinsella	Communications with school counsel regarding expense issue.	0.10	63.50
03/03/25	K. Nixon	Email L. Dawson re: Rice lunch invoice.	0.40	194.00
03/03/25	K. Nixon	Respond to email from Stretto re: claims data room.	0.10	48.50
03/05/25	K. Nixon	Attention to inquiry from Rice's attorney re: investment and bank accounts and emails re: the same.	0.60	291.00
03/05/25	S. Kinsella	Communications with client and Rice counsel regarding school expense issue.	0.30	190.50
03/06/25	S. Andre	Correspondence regarding Rice High School.	0.20	113.00
03/06/25	S. Kinsella	Phone call with counsel for school regarding school expenses (.6); communications with client regarding post-petition operating issues (.4).	1.00	635.00
03/10/25	S. Kinsella	Communications with counsel for school regarding expense issue.	0.10	63.50
03/11/25	K. Nixon	Email L. Dawson re: additional information re: Rice High School.	0.10	48.50
03/11/25	S. Kinsella	Communications with school counsel regarding school expenses (.4); follow up with client regarding the same (.4); receive utility invoices and communications regarding the same with utility providers and local counsel (.4).	1.20	762.00
03/12/25	S. Kinsella	Communications with school counsel regarding school expense issue.	0.30	190.50
03/13/25	K. Nixon	Attention to information requests from Rice.	0.20	97.00
03/13/25	S. Kinsella	Communications with client regarding pension issue (.3); communications with school counsel (.1).	0.40	254.00



03/14/25	S. Kinsella	Communications with client regarding priest benefit fund issue.	0.10	63.50
03/14/25	K. Nixon	Attention to information requests from Rice.	0.70	339.50
03/18/25	K. Nixon	Email client re: authorization to pay Corpus Christi self insurance claim.	0.10	48.50
03/28/25	K. Nixon	Attention to client inquiry re: Resurrection Park refund.	0.10	48.50
03/28/25	S. Kinsella	Communications with client regarding cemetery refund request.	0.10	63.50
<b>Current Legal Fees:</b>			<b>6.10</b>	<b>\$ 3,514.50</b>

#### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	2.88	1,828.80
Samuel M. Andre	565.00	0.16	90.40
Katherine Nixon	485.00	1.84	892.40
<b>Total</b>		<b>4.88</b>	<b>\$ 2,811.60</b>

#### Invoice Totals

Total for Current Legal Fees:	\$ 3,514.50
<b>Total For Current Invoice:</b>	<b>\$ 3,514.50</b>
<b>Your 80% Due:</b>	<b>\$ 2,811.60</b>



Invoice: 1921195  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5007

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

For Previously Unbilled Professional Services Rendered Through March 31, 2025

**Regarding: Claims Administration and Objections**

Total for Current Legal Fees:	\$ 3,918.00
<b>Total For Current Invoice:</b>	<b>\$ 3,918.00</b>
<b>Your 80% Due:</b>	<b>\$ 3,134.40</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888531	632.50		632.50
01/06/25	1901847	5,915.00		5,915.00
03/10/25	1914868	2,194.80		2,194.80
<b>Total Prior Balance:</b>				<b>\$ 8,742.30</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 4, 2025. If payment has been sent close to this date, please verify payment status.



Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/05/25	S. Kinsella	Attention to confirmation of third publication notice.	0.10	63.50
03/06/25	K. Nixon	Respond to email from Stretto re: additional publication notice.	0.10	48.50
03/07/25	K. Nixon	Review confidential survivor claims.	0.50	242.50
03/07/25	S. Kinsella	Receive update regarding filed claims.	0.10	63.50
03/10/25	K. Nixon	Respond to email from Stretto re: additional publication notice.	0.10	48.50
03/11/25	S. Kinsella	Communications with client regarding claim notifications.	0.10	63.50
03/11/25	K. Nixon	Return phone call to Bennington County administration re: notice of claims deadline.	0.20	97.00
03/14/25	S. Kinsella	Communications with noticing agent regarding status of publication notice.	0.10	63.50
03/14/25	K. Nixon	Review confidential survivor claims.	1.10	533.50
03/17/25	S. Kinsella	Communications with noticing agent regarding final publication notice.	0.10	63.50
03/17/25	K. Nixon	Reply to email from Stretto re: final publication notice.	0.10	48.50
03/18/25	K. Nixon	Email to counsel for UCC re: Stretto claims process.	0.10	48.50
03/20/25	K. Nixon	Emails to Stretto and committee counsel re: claims process issues.	0.20	97.00
03/21/25	K. Nixon	Emails with committee counsel and Stretto re: issues with claims process.	0.40	194.00
03/21/25	S. Kinsella	Communications with claims agent regarding claim notice concerns.	0.10	63.50
03/24/25	S. Kinsella	Review filed claims.	0.10	63.50



03/24/25	K. Nixon	Review confidential survivor claims.	1.50	727.50
03/25/25	K. Nixon	Review confidential survivor claims and emails to Stretto re: notices to claimants of claim numbers.	0.50	242.50
03/26/25	K. Nixon	Emails to Stretto and committee counsel re: notice to confidential claimants re: claim numbers.	0.10	48.50
03/27/25	K. Nixon	Review affidavit of publication.	0.30	145.50
03/28/25	K. Nixon	Review confidential survivor claims.	0.50	242.50
03/31/25	S. Kinsella	Communications with client regarding notice issue.	0.20	127.00
03/31/25	K. Nixon	Emails to committee counsel and Stretto re: request to make claim public (0.2); review confidential survivor claims (1.0).	1.20	582.00
<b>Current Legal Fees:</b>			<b>7.80</b>	<b>\$ 3,918.00</b>

**Timekeeper Summary**

<b><u>Timekeeper</u></b>	<b><u>Bill Rate</u></b>	<b><u>Hours</u></b>	<b><u>Billed Amount</u></b>
Steven R. Kinsella	635.00	0.72	457.20
Katherine Nixon	485.00	5.52	2,677.20
<b>Total</b>		<b>6.24</b>	<b>\$ 3,134.40</b>

**Invoice Totals**

Total for Current Legal Fees:	\$ 3,918.00
<b>Total For Current Invoice:</b>	<b>\$ 3,918.00</b>
<b>Your 80% Due:</b>	<b>\$ 3,134.40</b>



Invoice: 1921196  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5009

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

For Previously Unbilled Professional Services Rendered Through March 31, 2025

**Regarding: Employee Benefits and Pensions**

Total for Current Legal Fees:	\$ 3,178.00
<b>Total For Current Invoice:</b>	<b>\$ 3,178.00</b>
<b>Your 80% Due:</b>	<b>\$ 2,542.40</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

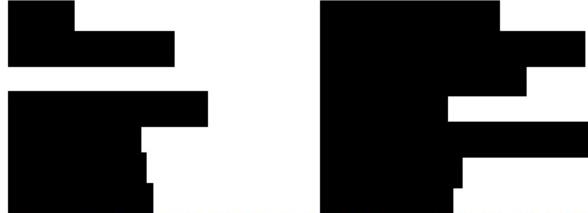
**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/10/25	1914870	12,394.40		12,394.40
<b>Total Prior Balance:</b>				<b>\$ 12,394.40</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 4, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1921196  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5009

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
03/11/25	S. Andre	Analyze UCC response to priest benefit fund memorandum.	1.00	565.00
03/21/25	S. Andre	Prepare for hearing on priest pension issue and Rule 2004 exam..	0.50	282.50
03/25/25	S. Kinsella	Analyze court questions regarding priest pension plan.	0.20	127.00
03/25/25	S. Andre	Prepare for and participate in hearing on priest pension issue and Rule 2004 exam.	3.90	2,203.50
<b>Current Legal Fees:</b>			<b>5.60</b>	<b>\$ 3,178.00</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.16	101.60
Samuel M. Andre	565.00	4.32	2,440.80
<b>Total</b>		<b>4.48</b>	<b>\$ 2,542.40</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 3,178.00
<b>Total For Current Invoice:</b>	<b>\$ 3,178.00</b>
<b>Your 80% Due:</b>	<b>\$ 2,542.40</b>



Invoice: 1921197  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5010

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

For Previously Unbilled Professional Services Rendered Through March 31, 2025

**Regarding: Employment and Fee Applications**

Total for Current Legal Fees:	\$ 2,834.00
<b>Total For Current Invoice:</b>	<b>\$ 2,834.00</b>
<b>Your 80% Due:</b>	<b>\$ 2,267.20</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888526	2,987.50		2,987.50
12/05/24	1895351	4,680.50		4,680.50
01/06/25	1901848	3,813.50		3,813.50
03/10/25	1914874	5,962.40		5,962.40
<b>Total Prior Balance:</b>				<b>\$ 17,443.90</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 4, 2025. If payment has been sent close to this date, please verify payment status.



Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	K. Nixon	Email Dinse re: February invoices for monthly fee statement.	0.10	48.50
03/06/25	K. Nixon	Draft February monthly fee statements for Fredrikson and Dinse.	0.40	194.00
03/10/25	S. Kinsella	Analyze monthly report for Committee FA.	0.10	63.50
03/10/25	K. Nixon	Review BRG monthly fee statement.	0.20	97.00
03/11/25	K. Nixon	Finalize February 2025 monthly fee statements for Fredrikson and Dinse (0.7); emails to L. Dawson re: the same and FA monthly fee statement (0.2).	0.90	436.50
03/12/25	K. Nixon	Email local counsel, Dinse, and client re: filed February 2025 monthly fee statements.	0.20	97.00
03/14/25	K. Nixon	Email committee counsel re: w9 and remittance info for BRG.	0.10	48.50
03/17/25	K. Nixon	Respond to email from BRG re: remittance information (0.1); emails to client re: Stretto invoices (0.1).	0.20	97.00
03/21/25	K. Nixon	Email court staff re: Word versions of proposed orders granting first interim fee applications.	0.20	97.00
03/25/25	K. Nixon	Review orders granting first interim fee applications and emails to client and Dinse P.C. re: the same.	0.60	291.00
03/25/25	S. Stallings	Review emails from client and draft application to employ real estate agent and accompanying declaration.	1.20	282.00
03/26/25	K. Nixon	Respond to email from local committee counsel re: payment of fees (0.1); revise application to employ real estate broker (1.0).	1.10	533.50
03/26/25	S. Kinsella	Provide instruction regarding conflict issue for real estate agent.	0.10	63.50



03/28/25	K. Nixon	Prepare certificates of no objection for Fredrikson and Dinse February 2025 monthly fee statements (0.2); finalize application to employ real estate broker and emails to client and broker re: the same. (0.2)	0.40	194.00
03/31/25	K. Nixon	Revise application to employ real estate broker and emails to broker and committee counsel re: the same (0.3); finalize certificates of no objection for February 2025 monthly fee statements and emails to client and Dinse P.C. re: the same (0.3).	0.60	291.00
	<b>Current Legal Fees:</b>		<b>6.40</b>	<b>\$ 2,2834.00</b>

#### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.16	101.60
Katherine Nixon	485.00	4.00	1,940.00
Shataia Stallings	235.00	0.96	225.60
<b>Total</b>		<b>5.12</b>	<b>\$ 2,267.20</b>

#### Invoice Totals

Total for Current Legal Fees:	\$ 2,834.00
<b>Total For Current Invoice:</b>	<b>\$ 2,834.00</b>
<b>Your 80% Due:</b>	<b>\$ 2,267.20</b>



Invoice: 1921198  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5013

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

For Previously Unbilled Professional Services Rendered Through March 31, 2025

**Regarding: Meetings and Communications with Creditors**

Total for Current Legal Fees:	\$ 18,400.00
<b>Total For Current Invoice:</b>	<b>\$ 18,400.00</b>
<b>Your 80% Due:</b>	<b>\$ 14,720.00</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

*Payment is due within 30 days from receipt of invoice*

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888527	3,824.00		3,824.00
12/05/24	1895352	10,496.00		10,496.00
01/06/25	1901849	5,133.00		5,133.00
03/10/25	1914876	6,022.40		6,022.40
<b>Total Prior Balance:</b>				<b>\$ 25,475.40</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 4, 2025. If payment has been sent close to this date, please verify payment status.



Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/04/25	S. Andre	Correspondence regarding Committee discovery requests.	0.20	113.00
02/05/25	S. Andre	Analyze discovery requests.	0.60	339.00
02/12/25	S. Andre	Analyze and correspondence regarding UCC discovery requests.	1.30	734.50
02/14/25	S. Andre	Correspondence with client regarding discovery requests.	0.10	56.50
02/19/25	S. Andre	Analyze and begin preparing procedure for production of documents.	0.70	395.50
02/20/25	S. Andre	Assist in preparation of documents for production.	0.30	169.50
02/21/25	Litigation Support Consulting	Organize client project files for Committee discovery requests.	0.20	62.00
02/21/25	S. Andre	Prepare for and meet with co-counsel regarding UCC document requests and gathering for same.	0.70	395.50
02/25/25	S. Andre	Prepare documents for production.	0.60	339.00
02/26/25	S. Andre	Analyze updated Committee discovery requests and correspondence on same.	0.50	282.50
02/27/25	S. Andre	Prepare for and meeting with client regarding document requests.	1.30	734.50
03/03/25	S. Kinsella	Review client documents produced in response to 341 meeting document requests.	0.20	127.00
03/03/25	S. Andre	Analyze client documents for production.	0.50	282.50
03/03/25	S. Andre	Analyze applicable law regarding discovery issues.	0.50	282.50
03/03/25	K. Nixon	Strategize re: scope of 2004 examination.	0.20	97.00
03/04/25	S. Andre	Correspondence regarding 341 documents.	0.20	113.00
03/04/25	S. Kinsella	Review Rule 2004 exam motion and send to relevant parties.	0.80	508.00



03/04/25	K. Nixon	Confirm notice period and response deadline for motion for 2004 examination.	0.10	48.50
03/04/25	S. Andre	Analyze UCC Rule 2004 motion and correspondence on same.	0.80	452.00
03/05/25	S. Kinsella	Communications with other Catholic entities regarding scope of Rule 2004 examination.	0.50	317.50
03/05/25	S. Andre	Correspondence regarding Rule 2004 motion (.2); prepare for and meeting with UCC regarding case (.2).	0.40	226.00
03/06/25	S. Andre	Correspondence and analysis of client documents for production.	0.20	113.00
03/06/25	S. Kinsella	Analyze Rule 2004 discovery requests and communicate with other Catholic entities regarding the same.	0.60	381.00
03/06/25	S. Andre	Prepare response to Rule 2004 motion.	0.30	169.50
03/06/25	K. Nixon	Attention to email from Mountain Lake re: payment for Rice invoice.	0.10	48.50
03/06/25	S. Andre	Prepare for and meeting with UCC.	0.30	169.50
03/07/25	S. Kinsella	Communications with Catholic entities regarding discovery requests.	0.10	63.50
03/07/25	K. Nixon	Draft objection to motion for Rule 2004 examination.	0.30	145.50
03/07/25	S. Andre	Correspondence regarding Rule 2004 motion.	0.50	282.50
03/10/25	S. Kinsella	Communications with client regarding document production.	0.30	190.50
03/10/25	S. Andre	Correspondence regarding UCC Rule 2004 motion.	0.30	169.50
03/11/25	S. Kinsella	Communications with Catholic Charities counsel regarding committee document requests.	0.10	63.50
03/11/25	S. Andre	Correspondence with UCC regarding status meeting (.1); call with VCCF regarding Rule 2004 motion (.2).	0.30	169.50
03/11/25	K. Nixon	Review self-insurance claim and email counsel for committee re: the same (0.2); coordinate to add confidential claimant to creditor matrix (0.1).	0.30	145.50
03/11/25	K. Nixon	Draft objection to motion for Rule 2004 examination.	2.80	1,358.00
03/13/25	S. Kinsella	Meeting with Committee counsel (.6); review and revise objection to Rule 2004 exam motion (1.3).	1.90	1,206.50
03/13/25	S. Andre	Prepare response to UCC's Rule 2004 motion.	3.70	2,090.50



03/13/25	S. Andre	Prepare for and attend weekly meeting with UCC.	0.60	339.00
03/13/25	K. Nixon	Communications with Burlington city attorney re: prepetition amounts owed to public works.	0.20	97.00
03/14/25	S. Andre	Analyze documents from co-counsel for production and correspondence on same.	0.20	113.00
03/14/25	S. Andre	Prepare response to UCC Rule 2004 motion and correspondence regarding same.	0.40	226.00
03/14/25	S. Kinsella	Consult on objection to Rule 2004 exam motion. (No Charge)	0.10	0.00
03/17/25	S. Andre	Correspondence regarding documents in response to Rule 2004.	0.10	56.50
03/17/25	S. Kinsella	Review and revise objection to Rule 2004 examination motion (.9); communications with counsel for other Catholic-related entity regarding the same (.2).	1.10	698.50
03/17/25	S. Andre	Assist in preparation of objection to UCC Rule 2004 motion and correspond with client on same.	0.30	169.50
03/18/25	S. Kinsella	Review objections to Rule 2004 examination motion.	0.10	63.50
03/18/25	S. Andre	Prepare and coordinate filing of Diocese objection to UCC Rule 2004 motion and correspondence on same.	0.90	508.50
03/18/25	S. Andre	Analyze joining objections to UCC Rule 2004 motion.	0.20	113.00
03/19/25	S. Andre	Correspond with client regarding accounting data in response to discovery requests.	0.10	56.50
03/19/25	S. Andre	Analyze client documents for production.	1.80	1,017.00
03/19/25	S. Andre	Analyze third party objection to UCC Rule 2004 motion.	0.20	113.00
03/20/25	S. Andre	Analyze and prepare client documents for production and correspondence on same.	0.40	226.00
03/20/25	S. Kinsella	Meeting with Committee counsel.	0.40	254.00
03/21/25	S. Kinsella	Analyze outstanding 341 production and provide instruction regarding the same.	0.70	444.50
03/24/25	S. Andre	Coordinate production of documents do UCC.	0.20	113.00
03/24/25	S. Kinsella	Respond to client questions regarding discovery requests.	0.30	190.50
03/26/25	S. Andre	Prepare and produce client documents in response to 341 and discovery requests.	0.20	113.00



03/27/25	S. Andre	Analyze court order on Rule 2004 motion and correspond with third parties on same.	0.20	113.00
03/28/25	S. Andre	Correspondence regarding Committee request for document.	0.10	56.50
03/28/25	S. Andre	Prepare letter to insurer regarding production of insurance document to Committee pursuant to Rule 2004 order.	0.40	226.00
03/28/25	K. Nixon	Email client re: request from committee counsel for property spreadsheet.	0.10	48.50
03/28/25	K. Nixon	Revise and finalize letter to insurer re: production of agreement pursuant to Rule 2004 order.	0.20	97.00
03/31/25	S. Andre	Correspond with U.S. Trustee regarding production of documents.	0.10	56.50
03/31/25	K. Nixon	Coordinate sending notice of case and claim filing deadline to additional creditor.	0.10	48.50
<b>Current Legal Fees:</b>			<b>32.40</b>	<b>\$ 18,400.00</b>

#### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	5.68	3,606.80
Steven R. Kinsella	0.00	0.08	0.00
Samuel M. Andre	565.00	16.56	9,356.40
Katherine Nixon	485.00	3.52	1,707.20
Litigation Support Consulting	310.00	0.16	49.60
<b>Total</b>	<b>26.00</b>		<b>\$ 14,720.00</b>

#### Invoice Totals

Total for Current Legal Fees:	\$ 18,400.00
<b>Total For Current Invoice:</b>	<b>\$ 18,400.00</b>
<b>Your 80% Due:</b>	<b>\$ 14,720.00</b>



Invoice: 1921199  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5018

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

For Previously Unbilled Professional Services Rendered Through March 31, 2025

**Regarding: Reporting**

Total for Current Legal Fees:	\$ 818.00
<b>Total For Current Invoice:</b>	<b>\$ 818.00</b>
<b>Your 80% Due:</b>	<b>\$ 654.40</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888529	10,896.00		10,896.00
12/05/24	1895354	12,742.00		12,742.00
01/06/25	1901852	252.00		252.00
03/10/25	1914878	436.40		436.40
<b>Total Prior Balance:</b>				<b>\$ 24,326.40</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 4, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1921199  
Invoice Date: April 4, 2025  
Client Number: 098358  
Matter Number: 098358.5018

Diocese of Burlington  
Bishop McDermott  
55 Joy Dr  
South Burlington, VT 05403

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
03/05/25	S. Kinsella	Respond to client questions regarding MORs.	0.20	127.00
03/05/25	K. Nixon	Review MOR professional compensation reporting requirements and emails to client answering questions re: the same.	0.60	291.00
03/20/25	S. Kinsella	Respond to client MOR question.	0.10	63.50
03/20/25	K. Nixon	Assist in preparation of February MOR.	0.50	242.50
03/20/25	S. Stallings	Finalize and e-file monthly operating report and send bank records to UST.	0.40	94.00
<b>Current Legal Fees:</b>			<b>1.80</b>	<b>\$ 818.00</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.24	152.40
Katherine Nixon	485.00	0.88	426.80
Shataia Stallings	235.00	0.32	75.20
<b>Total</b>		<b>1.44</b>	<b>\$ 654.40</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 818.00
<b>Total For Current Invoice:</b>	<b>\$ 818.00</b>
<b>Your 80% Due:</b>	<b>\$ 654.40</b>

**CERTIFICATE OF SERVICE**

I, Steven R. Kinsella, hereby certify that on April 11, 2025, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using CM/ECF, which sent notification of such filing to all ECF participants. Additionally, I served the same on the following Notice Parties via the method indicated below:

<b>Via E-Mail</b>	<b>Via ECF</b>	<b>Via ECF</b>
Roman Catholic Diocese of Burlington, Vermont Attn: Lorei Dawson 55 Joy Drive South Burlington, VT 05403 (e-mail address omitted)	United States Trustee Attn: Lisa M. Penpraze Leo O'Brien Federal Building Room 620 Albany, NY 12207 Lisa.Penpraze@usdoj.gov	Pachulski Stang Ziehl & Jones Attn: Brittany Mitchell Michael 780 Third Avenue 34th Floor New York, NY 10017 bmichael@pszjlaw.com
<b>Via ECF</b> Obuchowski Law Office Attn: Raymond J. Obuchowski 1542 Route 107 PO Box 60 Bethel, VT 05032 Ray@oeblaw.com	<b>Via ECF</b> Lemery Greisler LLC Attn: Paul A. Levine 677 Broadway, 8th Floor Albany, NY 12207 plevine@lemerygreisler.com	

/s/ Steven R. Kinsella  
Steven R. Kinsella